Exhibit 4

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January 24, 2025

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Re: *Headwater Research LLC v. Samsung Electronics Co., Ltd. et al.,* **Case No. 2:23-cv-00641 (E.D. Tex.)**

Dear Counsel:

Samsung Electronics Co., Ltd. ("**Samsung**") has filed an *inter partes* review (IPR) petition (IPR2024-01337) with the Patent Trial and Appeal Board (PTAB) to address the validity of claims 1-30 of U.S. Patent No. 8,588,110 ("**the '110 Patent**"). The tables in attached Appendix A list all grounds, challenged claims, and references asserted in IPR2024-01337.

I write to inform you that Samsung hereby stipulates that if the PTAB institutes IPR2024-01337, Samsung agrees not to pursue any grounds raised in the IPR, any grounds raised within Samsung's invalidity contentions that were raised or could have been raised in the IPR, or any grounds Samsung could have reasonably raised before the PTAB, in this district court litigation or any parallel proceeding. *Sotera Wireless, Inc. v. Masimo Corp.,* Case IPR2020-01019, Paper 12 (PTAB Dec. 1, 2020). Samsung reserves the right to assert in the District Court proceedings prior art that is not eligible for PTAB consideration, e.g., the system art noted in Appendix B below.[1] Samsung's reservation is consistent with a *Sotera* stipulation because the grounds listed in Appendix B are based on prior art that is ineligible for consideration before the PTAB, and that could not have been raised before the PTAB.

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[1] Samsung notes that discovery in the District Court proceedings is currently ongoing and Samsung expects Google, Apple, BlackBerry, and Microsoft to produce additional materials relating to the system art listed in Appendix B below. For the avoidance of doubt, Samsung reserves the right to rely on such forthcoming productions in the District Court proceedings.

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For the sake of clarity and to avoid any doubt, if the PTAB declines to institute IPR2024-01337, Samsung reserves the right to assert any grounds of invalidity in the District Court proceedings against the '110 Patent.

Sincerely,

Thad Kodish

Attorney for Samsung Electronics Co., Ltd.

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Appendix A – Grounds and Prior Art References Used in IPR2024-01337

Ground	Claim(s)	35 U.S.C. § 103
1A	1-16, 19, 21, 23-24, 27-30	Jobs in view of Jones and Rao
1B	17-18, 24	Jobs in view of Jones, Rao, and Bocking
1C	20	Jobs in view of Jones, Rao, and Cunningham
1D	22	Jobs in view of Jones, Rao, and Padmanabhan
1E	25	Jobs in view of Jones, Rao, and Ibrahim
2	26	Jobs in view of Jones, Rao, Bocking, Cunningham

List of References

Reference Name	Details
Jobs	U.S. Pat. App. Pub. No. 2007/0149252
Jones	U.S. Pat. No. 8,285,850
Rao	U.S. Pat. App. Pub. No. 2006/0039354
Bocking	U.S. Pat. App. Pub. No. 2006/0075090
Cunningham	U.S. Pat. App. Pub. No. 2006/0019632
Padmanabhan	U.S. Pat. App. Pub. No. 2006/0203739
Ibrahim	U.S. Pat. App. Pub. No. 2008/0026787

Appendix B – System Art

System / OS / Application
Android Devices (e.g., T-Mobile G1/HTC Dream, Samsung GT-I7500 Galaxy, Nexus One, and emulators)
Apple Devices (e.g., iPhone, iPhone 3G, iPhone 3GS, and emulators)
Windows Mobile Devices (e.g., HTC Ozone, HTC Imagio XV6975, HTC Tilt 2, HTC Pure, Samsung C6620, Samsung SPH-i325 Ace, Samsung Intrepid SPH-i350, and emulators)

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System / OS / Application
BlackBerry Devices (e.g., BlackBerry Bold 9780, BlackBerry Bold 9700, BlackBerry Bold 9000, BlackBerry Curve 3G 9330, BlackBerry Storm 2 9550, BlackBerry Torch 9800, and emulators)
Android including Android 1.0 (released September 2008), Android 1.1 (released February 2009), Android Cupcake (1.5) (released April 2009), Android Donut (1.6) (released September 2009), Android Eclair (2.0, 2.0.1, 2.1) (released October 2009 - January 2010)
iPhone OS including iPhone OS 1.0 (released June 29, 2007), iPhone OS 2.0 (released July 11, 2008), iPhone OS 3.0 (released June 19, 2009)
BlackBerry OS 1, BlackBerry OS 2, BlackBerry OS 3 (released March 2002), BlackBerry OS 4.0 (released June 2003), BlackBerry OS 4.1 (released January 2006), BlackBerry OS 4.2 (released June 2007), BlackBerry OS 4.3 (released October 2007), BlackBerry OS 4.5/4.6 (released June 2008), BlackBerry OS 4.7 (released November 2008), BlackBerry OS 5.0 (released August 2009)
Windows Mobile including Windows Mobile 6.0 (released February 12, 2007), Windows Mobile 6.1 (released April 1, 2008), and Windows Mobile 6.5 (released May 11, 2009)
JuiceDefender (including JuiceDefender and associated add-on application, UltimateJuice)
Microsoft Applications (including Microsoft Outlook Mobile, Windows Media Player Mobile, Windows Live, and MyPhone)
Apple Applications (including Mail, iTunes Store, iTunes, Messages, Calendar, MobileMe, Backup, Voicemail, VPN, and Newsstand API)
BlackBerry Applications (including Roxio Media Manager, Email, BlackBerry App World, Podcasts, Preferred Wireless Network List)